

PSC: Preparations – Paris MoU CIC 2014 forthcoming

As will be known, the Paris MoU regime regularly launches Concentrated Inspection Campaigns, or CIC during which time particular focus is on given aspect of maritime safety. Usually the campaign is launched at 1st Sept. and continues till year-end. But we have seen that eager PSC authorities and their PSCOs continue the campaign till after the turn of the year.

In a Paris MoU newsletter from 2013 it has been advised that this year's campaign will concentrate on rest hour keeping and the pertaining records. Verification will be sought that the ship's SMS is, in line with the STCW and the MLC regulations and that practice on board reflects correct procedures.

Already during the first months following the MLC ratification, a number of ships were detained on basis that the rest hour records were not in order. You should note that during a campaign, the focus will be much stricter than up until now, and many more ships will be detained on this basis.

Hence, the FMA would like to inform and remind masters and shipowners/manager that by Port State authorities the following conditions are usually deemed reason for detention:

- When the rest hours recordings are missing, or when they are not up-to-date,
- In cases where rest hours are not kept while the ship is in port. This is because it is reckoned that the watch-keeping officers have not been duly rested to take the ship safely out of port,
- When the recorded rest hours are not in congruence with other documentation on board, e.g. the Bridge log book or E/R log book, which may show that a given officer has been on duty – even for special reasons – while his rest hour records show that he has been resting. This is interpreted as forging records and looked upon with severe eyes.
- Deficiencies in the SMS (ISM handbooks) that hamper the correct keeping of rest hours in practice and/or on the paper.

Consequently, the FMA will urge and remind all shipowners/management companies to organize for robust work routines on board and to follow the below advice:

1. The table of shipboard working arrangements must be posted in a place that all crew members frequent/have easy access to. On ships with a 2 shift watch, for example a 5/7 watch system is recommended rather than a 6/6 watch system since some countries do not find it possible to comply with the regulations through 6/6 shift systems due to the time spent handing over duties.
2. The minimum safe manning document and the certificates/documents of the crew members prescribed will be thoroughly scrutinized. Be prepared to present these documents.
Note: The ship will be detained if the manning is not in accordance with the safe manning document.
3. According to some safe manning documents, the ship is permitted to have on board fewer crew members under certain conditions – such as a rather small trading area/day voyages. The master must be able to give the PSC officer a precise account of these conditions.
4. If the ship has been approved for voyages with unmanned machinery spaces (UMS), the certificates/documents containing this permit must also be available at the PSC inspection. If the ship is of more than 3,000 kW, an engineer officer must also be on call when the ship is berthed (in case there is only one engineer officer on board, he must not disembark).
5. Records of hours of rest must be kept for all crew members. The record should be kept on a daily basis. The record is to be signed at least every month by the master and the relevant crew member and be handed over to him or her.

6. If the ship has been permitted by the FMA to keep the records of hours of rest electronically, the permit must be available during the PSC inspection. The records are to be printed, signed and handed over to the crew member at least once a month.
Note: All electronic hours of rest systems must have been approved by the FMA.
7. Records of hours of rest must be filled in correctly and in accordance with the actual hours of rest. The recordings made in the records of hours of rest and the recordings made in the various ship logs must be in accordance with each other as well as with any recordings of overtime. Special attention must be paid to ensure that arrival/departure, pilot embarkation, drills, calling in standby personnel, machinery space controls, etc. are recorded correctly.
8. In addition to the requirement for a daily period of rest, attention must be paid to the requirement for the periods of rest during the recent seven days.
9. When planning the voyage, it must be ensured that the provisions on hours of rest are also observed during the first watches after departure. It must be possible to document this at a PSC inspection. This can, for example, be done by presenting a voyage plan where the time of departure has been set so that the provisions on hours of rest are observed during the subsequent watches.
Note: If the ship does not ensure this, it will be detained until the watch-keeping crew has been sufficiently rested.
10. The Master shall ensure, and it must also be possible to document that crew members on call receive compensating hours of rest if they have been called in for a watch.
Note: In such cases a deviation report shall be attached, which briefly states the circumstances and the reason for the need for extra work hours.
11. It must be evident from the records of hours of rest and the ship's log that a dedicated look-out has had the watch in accordance with the provisions of the STCW Convention, i.e. during the night, in reduced visibility, in dense traffic, etc.
12. The ship's SMS (ISM system) must contain a procedure for what to do in case the provisions on hours of rest are extraordinarily breached. In case of extraordinary breaches, the ship must immediately inform the company which will, subsequently, insofar as possible take measures to prevent future breaches. It must be possible to present the procedure, the report to the company and any follow-up actions taken by the company at a PSC inspection.
Note: If the Master is unable to submit the above documentation, the ship risks being detained, or at the best, being given an ISM non-conformity (which counts as five non-conformities in this case).

Preliminary conclusion

To avoid deficiencies and in worst cases a detention in port, the FMA will urge all ships under the Faroese flag to

- duly note and follow up on these recommendation, and
- to ensure that the conditions on board are in compliance with the regulations

in the international conventions and the Faroese Exec. Order No. 107 from 2 November 2012 on rest hour keeping. The English version of the Exec. Order is found in our home page in the MLC room under [Legislation](#).